

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

MICHAEL W. INGRAM,

Plaintiff,

v.

**DARON HALL, SHERIFF; AUSTIN BODIE,
ADMINISTRATOR; ABL FOOD
SERVICE, INC.; JERRY MATHES,
FOOD SERVICE DIRECTOR; V. DULIN,
FOOD SERVICE DIRECTOR; SGT. BARNES,
DAVIDSON COUNTY SHERIFF'S OFFICE;
SGT. FREEMAN, DAVIDSON COUNTY
SHERIFF'S OFFICE; SGT. McCUTCHEON,
DAVIDSON COUNTY SHERIFF'S OFFICE,**

Defendants.

Civil Action No. 3:09-CV-00037

MAGISTRATE KNOWLES

AFFIDAVIT OF VERNISTENE DULIN

Vernistene Dulin, after being duly sworn in accordance with the law, deposes and testifies as follows:

1. I am a resident of Nashville, Davidson County, Tennessee. I am an adult over eighteen (18) years of age. The matters in this Affidavit are made of my personal knowledge. They are facts and opinions which I believe would be admissible in evidence and I affirmatively state that I am competent to testify to the matters contained herein.

2. I have been an employee of ABL Management, Inc. for approximately three (3) years.

3. I have held the title of Senior Food Service Director at ABL Management, Inc. for approximately ten (10) months.

EXHIBIT 2

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4. My office is located at the Davidson County detention complex on Harding Place Road.

5. As the Senior Food Service Director at ABL Management, Inc. my job duties are of an administrative nature.

6. Any interaction I may have with inmates generally would involve interaction with inmates that work in the kitchen at the Davidson County Criminal Justice Center.

7. The only interaction I have had with Michael Ingram has been through the written grievance process. I have spoken to Mr. Ingram about his grievances on only two occasions. The first time I spoke to Mr. Ingram was to try and clarify what his actual complaints were in his grievances. The second and last time I spoke to Mr. Ingram was at his request. When I went to see Mr. Ingram, he stated that his diet was fine and that he didn't really remember what he wanted when he requested to see me. I listened to Mr. Ingram and told him that ABL Management, Inc. has made good faith efforts to ensure that his diet is correct.

8. At no time have I received notice from any source that Michael Ingram's health is or could be in danger from his diet at the Davidson County Criminal Justice Center as provided by ABL Management, Inc.

9. At no time have I received notice from any source that the diet provided to Michael Ingram by ABL Management, Inc. is not in accordance with proper nutritional guidelines.

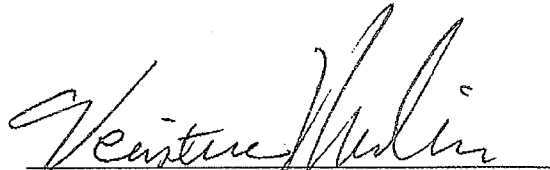
10. As the Senior Food Service Director at ABL Management, Inc., I am familiar with the portion control standard serving equipment used by ABL Management, Inc. at the Davidson County Criminal Justice Center. ABL Management, Inc. uses the portion control standard serving equipment at the Davidson County Criminal Justice Center to measure the exact

portions of food given to each inmate in accordance with the ABL Management, Inc. diet assigned to that inmate.

11. As the Senior Food Service Director at ABL Management, Inc., I am familiar with the portions of food served to inmates at the Davidson County Criminal Justice Center. The portions of food served to inmates at the Davidson County Criminal Justice Center comply with the Portion Control Serving Equipment Standard mandated by the agreement with the Metropolitan Government of Davidson County.

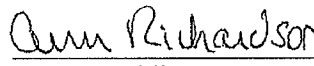
12. As the Senior Food Service Director at ABL Management, Inc., I am familiar with the different ABL Management, Inc. diets assigned to inmates at the Davidson County Criminal Justice Center. These diets are assigned by ABL Management, Inc.'s certified dietician, Babette Lanius. The portions of food that is served to each inmate at the Davidson County Criminal Justice Center comply with the specific diet assigned to that inmate.

FURTHER, DEPONENT SAITH NOT.

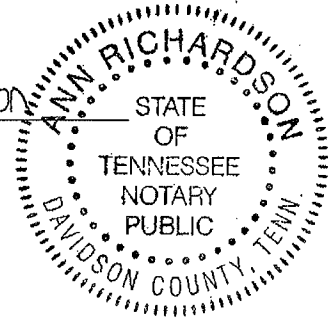

VERNISTENE DULIN

STATE OF TENNESSEE)
COUNTY OF DAVIDSON)

On this 12th day of October, 2009, personally appeared Vernistene Dulin to me known to be the person described in the foregoing Affidavit and the person who executed the foregoing Affidavit and acknowledged that she executed the same of her free act and deed after taking an oath.


Notary Public

My Commission Expires: Nov. 7, 2011



My Commission Expires NOV. 7, 2011